

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Reply To:

Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

Mark Williams, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
Land Protection Branch
Mark Smith, Branch Chief

March 18, 2011

VIA E-MAIL AND REGULAR MAIL

COPY

Trinity Industries, Inc.
c/o Mr. Richard T. Barrett
2525 Stemmons Freeway
Dallas, Texas 75207

Re: December 2010 Semi-Annual Voluntary Remediation Program Progress Report
Manchester Tank Company, HSI No. 10765
811 West Avenue, Cedartown, Polk County, Georgia
Tax Parcel 024-014

Dear Mr. Barrett:

The Georgia Environmental Protection Division (EPD) has reviewed the first semi-annual progress report prepared by Bullock Environmental, LLC (Bullock) on your behalf. The report fails to include a revised conceptual site model and schedule describing progress toward the specified milestones. Therefore, please revise the December 2010 Semi-annual Progress Report based on the following comments and resubmit that document to EPD by no later than April 29, 2011.

Conceptual Site Model (CSM):

1. A revised CSM must be included as part of the semi-annual progress reports. Therefore, please revise Section 2.0 "Preliminary Conceptual Site Model", Figures 1 through 10, and Tables 1 through 5 particularly denoting any new data obtained since the submittal of the approved application. Specifically, the progress report states that a groundwater-sampling event was conducted on August 16 through August 21, 2010, but the data was not provided. All analytical data collected in a given period, and the registered professional's interpretation of that data, become part of the conceptual site model (CSM) and should therefore be included in narrative, tables, and figures of the associated progress report. Note that laboratory data sheets do not need to be included.
2. Comment 4 of EPD's June 4, 2010 letter required Trinity to sample the Zartic well. In a July 15, 2010 meeting between representatives of Trinity and EPD, EPD agreed to postpone sampling of the Zartic well until a deep zone groundwater flow determination has been made, with emphasis on flow in the zone of MW-7D. That determination was to be made prior to submittal of the first progress report. Please submit results from the installation of the two additional wells, and Trinity's determination of deep zone groundwater flow at the former Manchester Tank Facility.
3. Comment 5 from EPD's June 4, 2010 letter, which requests further evaluation of current and future receptors at the site, has yet to be addressed. Please include

all existing pathways including vapor intrusion, as the delineation of the extent of contamination has not been completed. EPD notes that there are residences located approximately 1000' in the direction of surficial groundwater flow on the other side of the Missouri Machine and Plow property.

4. Please revise or include additional isoconcentration maps that indicate the extent of all regulated substances detected above the selected delineation criteria in soil and groundwater at the qualifying and non-qualifying properties.
5. Please revise Figure 1 to include separate cross-sections along the flow direction of the surficial aquifer and another along the flow direction of the deeper aquifer. The cross-sections should also include isoconcentration lines for regulated substances.

Voluntary Investigation and Remediation Plan (VIRP):

6. Please provide a response to Comments 3 and 5 of EPD's February 26, 2010 letter, which specifically address the selected corrective action of Ozone injection at the site.
7. Please revise Section 3.0 "Preliminary Remediation Plan." Specifically, this section should include the activities completed since the application was approved, and activities to be completed within the next reporting period. The narrative and schedule should clearly indicate progress toward the milestones specified in the schedule and the VIRP checklist (ie: horizontal delineation on-site, horizontal delineation off site, etc.).

PG/PE Hours and Certification:

8. The progress report does not include the professional geologist (PG)/engineer (PE) certification as required by Item 6 of the VIRP checklist. Please provide this certification. In accordance with item 6, the table summarizing invoices should specify those hours solely billed by the PE/PG overseeing the work.

Non-Qualifying Properties:

9. Conditions 2 and 4 of EPD's June 4, 2010 NOD required Trinity to apply to EPD to include the affected Rome Plow property as a qualifying property, or notify EPD the non-qualifying property is not included. If you do not include this property as a qualifying property under the Act, investigation and remediation of that property will be required pursuant to the Hazardous Site Response Act (HSRA) and its associated Rules. Furthermore, Trinity must remain in compliance with HSRA and its associated Rules; otherwise, Trinity may not be eligible as a participant in the Voluntary Remediation Program.

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EPD may, at its sole discretion, review and comment on documents submitted by Trinity. However, failure of EPD to respond to a submittal within any timeframe does not relieve Trinity from complying with the provisions, purposes, standards and policies of the Act.

Please submit the revised December 2010 Semi-annual Progress Report by April 29, 2011. Please include responses to all comments above and in the June 4, 2010 NOD with the revision. The next semi-annual progress report is due by June 1, 2011. If you have any questions, please contact Greg Gilmore at (404) 657-8600.

Sincerely,



Alexandra Y. Cleary
Program Manager
Response and Remediation Program

c: Greg D. Hall, P.G., Bullock Environmental, LLC

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